



Jordan L. Lurie (SBN 130013)  
[Jordan.Lurie@capstonelawyers.com](mailto:Jordan.Lurie@capstonelawyers.com)  
Tarek H. Zohdy (SBN 247775)  
[Tarek.Zohdy@capstonelawyers.com](mailto:Tarek.Zohdy@capstonelawyers.com)  
Cody R. Padgett (SBN 275553)  
[Cody.Padgett@capstonelawyers.com](mailto:Cody.Padgett@capstonelawyers.com)  
CAPSTONE LAW APC  
1840 Century Park East, Suite 450  
Los Angeles, California 90067  
Telephone: (310) 556-4811  
Facsimile: (310) 943-0396

*Attorneys for Plaintiffs Jean MacDonald,  
Veronica H. Aguirre, and Brian C. Barbee*

Amir Nassihi  
SHOOK, HARDY & BACON L.L.P.  
One Montgomery, Suite 2700  
San Francisco, California 94104  
Telephone: (415) 544-1900  
[anassihi@shb.com](mailto:anassihi@shb.com)

Dated: April 24, 2014

John M. Thomas (266842)  
[jthomas@dykema.com](mailto:jthomas@dykema.com)  
Krista L. Lenart (admitted *pro hac vice*)  
[klenart@dykema.com](mailto:klenart@dykema.com)  
David M. George (admitted *pro hac vice*)  
[dgeorge@dykema.com](mailto:dgeorge@dykema.com)  
DYKEMA GOSSETT PLLC  
2723 South State Street, Suite 400  
Ann Arbor, MI 48103  
Telephone: (734) 214-7600  
Facsimile: (855) 264-3653

*Attorneys for Defendant FORD MOTOR COMPANY*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

JEAN MACDONALD, VERONICA H.  
AGUIRRE, and BRIAN C. BARBEE,  
individually, and on behalf of a class of similarly  
situated individuals,

Plaintiffs,

vs.

FORD MOTOR COMPANY,  
  
Defendant.

Case No. 3:13-cv-02988-JSC

Honorable Judge Jon S. Tigar

**STIPULATION TO EXTEND TIME FOR  
FORD TO RESPOND TO SECOND  
AMENDED CLASS ACTION  
COMPLAINT PURSUANT TO L.R. 6.1(A)**

Current response date: April 28, 2014  
New response date: May 6, 2014

1 WHEREAS, Plaintiffs Jean MacDonald, Veronica H. Aguirre, and Brian C. Barbee  
2 (“Plaintiffs”) filed their Second Amended Class Action Complaint (“SAC”) on October 24, 2013,  
3 against Defendant Ford Motor Company (“Defendant”);

4 WHEREAS, Defendant filed a Motion to Dismiss the SAC on November 14, 2013, to which  
5 the Court issued an Order Granting in Part, Denying in Part Defendant’s Motion to Dismiss on  
6 March 31, 2014;

7 WHEREAS, the Court ordered Plaintiffs to file an amended complaint or a notice of  
8 submission to the Court’s dismissal of those claims by April 14, 2014.

9 WHEREAS, on April 14, 2014, Plaintiffs filed a Notice Submitting to the Court’s Order on  
10 Defendant’s Motion to Dismiss Second Amended Complaint, which indicated that they would not be  
11 filing an additional amended complaint at this time, but that Plaintiffs reserved the right to seek  
12 leave to file an amended complaint at a later time, should further facts arise;

13 WHEREAS, pursuant to Fed. R. Civ. Pro. 12(a)(4), Defendant’s response to Plaintiff’s SAC  
14 was originally due on April 28, 2014;

15 WHEREAS, on or around April 15, 2014, Defendant’s counsel contacted Plaintiffs’ counsel  
16 with a request to extend Defendant’s time to respond to Plaintiffs’ SAC until May 6, 2014, and  
17 Plaintiffs agreed to the requested extension;

18 NOW, THEREFORE, Plaintiffs and Defendant, through their respective counsel hereby  
19 stipulate, pursuant to L.R. 6.1(a), that Ford Motor Company shall have until May 6, 2014 to respond  
20 to Plaintiffs’ Second Amended Class Action Complaint.

1 IT IS SO STIPULATED.

2  
3 Dated: April 23, 2014

4 By: /s/ Cody R. Padgett  
5 Jordan L. Lurie  
6 Tarek H. Zohdy  
7 Cody R. Padgett  
8 Capstone Law APC  
9 1840 Century Park East, Suite 450  
10 Los Angeles, California 90067  
11 Telephone: (310) 556-4811

*Attorneys for Plaintiffs,*

12  
13 Dated: April 23, 2014

14 By: /s/ David M. George  
15 John M. Thomas  
16 Krista L. Lenart (admitted pro hac vice)  
17 David M. George (admitted pro hac vice)  
18 DYKEMA GOSSETT PLLC  
19 2723 South State Street, Suite 400  
20 Ann Arbor, MI 48103  
21 Telephone: (734) 214-7600

22 Amir Nassihi  
23 One Montgomery, Suite 2700  
24 San Francisco, California 94104  
25 Telephone: (415) 544-1900

*Attorneys for Defendant*

**Certification of Compliance with N.D. Cal. L.R. 5.1(i)(3)**

I hereby certify that pursuant to N.D. Cal. L.R. 5.1(i)(3), I have obtained the authorization from the above signatories to file the above-referenced document, and that the above signatories concur in the filing's content.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 23, 2014.

Dated: April 23, 2014

DYKEMA GOSSETT PLLC

By: /s/ David M. George  
*Attorney for Defendant*